



Ryon Wharton
Vice President, Controller - Retail

February 21, 2011

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, DC
20551

RE: Proposed Regulation II - Debit Card Interchange Fees and Routing
(Docket No. R-1404; RIN No. 7100 AD63)

Dear Ms. Johnson:

As a merchant with 918 stores in the U.S., OfficeMax has carefully studied the "Durbin Amendment" provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the debit card interchange fees and routing rules proposed thereunder by the Board of Governors of the Federal Reserve System (the "Proposed Rules").

Over the past two years, we have experienced a 33% increase to our debit card interchange fees during a period of time when the vast majority of retailers have been compelled to cut costs and consumers have reduced their spending. There have been no benefits to retailers in the form of improved service, debit network coverage or fraud prevention as a result of these increases.

As OfficeMax strives to deliver value to its customers and investors during these difficult times, it is troubling that we are forced to accept such increases without explanation, negotiation, or the opportunity to take our business elsewhere.

OfficeMax wishes to affirm its support for Proposed Rules. We believe that the Proposed Rules establish interchange fees at an appropriate level in comparison to costs experienced in other parts of the payments industry. It is also our belief that the Proposed Rules will create much-needed competition among debit networks by allowing retailers to direct transactions to the networks offering the best value.

Yours Truly,

A handwritten signature in black ink, appearing to read "Ryon Wharton", with a long horizontal flourish extending to the right.

Ryon Wharton
Vice President, Controller - Retail